# Richmond Refinery LPS Bulletin – Reliability







# IMPACT ERM: Loss ID 33388

**Location:** Hydroprocessing Division, RLOP - Heavy Neutral Cracker (HNC)

#### **Contact Information:**

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**DeNOx Module Dirty Inspection.**Note an almost complete coverage of



Example of material found on inlet face to DeNOx shown to be matted together following the contours of the catalyst clusters.

# Tenets of Operations Violated:

Tenet 10 – Always involve the right people in decisions that affect procedures and equipment.

# **Incident Description:**

Beginning January 31, 2012, operations had to reduce feed at the RLOP Heavy Neutral Hydrocracker (HNC) to approximately 17.0 - 19.75 MBPD against the planned rate of 20.0 MBPD due a positive draft in the HNC furnace cluster. Process engineering supplied data showing the pressure drop across F-1551 DeNOx catalyst module (a part of the common flue gas system) has been increasing since the 4Q11 Major T/A. As the pressure drop increased, the draft indication on the HNC distillation furnaces began to read positive, creating a potentially unsafe condition. To keep the furnace in negative draft and within permit allowable NOx emissions, HNC feed had to be cut.

## **Investigation Findings:**

- Procedures did not address protecting the inlet face of the DeNOx module for plant start-up.
- 2) Trending of DeNOx degradation and plugging was viewed/analyzed for a one-year time period, which seemed to indicate sufficient run length capabilities. However, a longer review of the long-term history (i.e., a longer time span) of this issue indicated something to the contrary.
- Manufacturing does not have a DeNOX (SCR) best practice that provided information regarding long term asset strategy recommendations.

#### Lessons Learned / Business Practices:

- Significant debris was found (which was believed to have come from plant start up) were directed through the DeNOx, which caused plugging.
- 2) Equipment with a single point of vulnerability for a unit should be analyzed for degradation in alignment with the shutdown frequency interval in order to help better predict the probability of failure.
- 3) DeNOx plugging has occurred in other facilities in a similar manner.

### What Worked Well:

- Operations made necessary plant moves to alleviate the potentially unsafe condition of F-1550 operating in positive draft and remain within Title V NOx limits.
- 2) Furnace stack excess O2s were reduced which helped reduce the corrected NOx calculation.
- 3) Hydro combined maintenance team quickly planned and executed a plant slump to remove the plugged DeNOx module and replace it with a new one with zero incidents or injuries.

#### Recommendations:

- 1) Modify start-up procedures to protect DeNOx module from debris.
- 2) Adjust the timing of the performance analysis of DeNOx modules so that they are aligned with the shutdown frequency/schedule.
- 3) Generate a DeNOx Best Practice to provide recommendations and help share experiences through the Manufacturing system.

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